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[Additional counsel on signature
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSHUA CROSS, individually and
on behalf of similarly situated,

Plaintiff,

v.

HALEON US HOLDINGS LLC,

Defendant.

CASE NO. 2:24-cv-09325-MCS-PVC

**STIPULATION REGARDING
SCHEDULE FOR RESPONSE TO
AMENDED COMPLAINT**

Hon. Mark C. Scarsi
Courtroom 7C

Complaint Filed: October 29, 2024
Complaint Served: November 8, 2024
Amended Complaint: December 6, 2024
Response Due: December 20, 2024
New Response Date
(amended complaint): January 3, 2025

1 This Stipulation is entered into between Plaintiff Joshua Cross (Plaintiff), and
2 Defendant Haleon US Holdings LLC (“Haleon”).

3 **WHEREAS**, on October 29, 2024, Plaintiff filed a putative Class Action
4 Complaint (“Complaint”) in the above-captioned case;

5 **WHEREAS**, on November 26, 2024, the Court issued an order “extend[ing]
6 Defendant’s deadline to respond to the original complaint to December 6, 2024” and
7 “encourag[ing] the parties to agree on a reasonable briefing schedule before engaging
8 in motion practice,” ECF No. 15;

9 **WHEREAS**, Plaintiff filed an amended complaint on December 6, 2024
10 (“Amended Complaint”), replacing Haleon US Inc. with the proper entity, Haleon US
11 Holdings LLC (“Haleon”);

12 **WHEREAS**, Plaintiff has asked and Haleon has agreed that Plaintiff’s prior
13 service on Haleon US Inc. of notice under California’s Consumers Legal Remedies
14 Act will be deemed served on Haleon US Holdings LLC;

15 **WHEREAS**, the parties have discussed a more expedited schedule for Haleon’s
16 response to the Amended Complaint than previously proposed and, given the volume
17 of allegations and claims in the complaint, as well as the upcoming holidays and
18 scheduling conflicts, including international travel by both counsel for Haleon and
19 counsel for Plaintiff, the parties agreed that Haleon will have an additional 14 days to
20 respond to the amended complaint, Plaintiff will have 24 days to file his opposition,
21 and Haleon will have 14 days to file its reply;

22 **WHEREAS**, this extension will not alter the time of any other event or
23 deadline already fixed by Court order;

24 **WHEREAS**, this is the first stipulation for extension of time for the response to
25 the Amended Complaint.

26 **THEREFORE, THE PARTIES AGREE AND STIPULATE** as follows:

- 27 1. The deadline for Haleon to answer or respond to the Amended Complaint
28 shall be extended from December 20, 2024, until January 3, 2025.

2. If Haleon files a motion to dismiss, any opposition by Plaintiff shall be filed on or before January 27, 2025.

3. Any reply by Haleon shall be filed on or before February 10, 2025.

IT IS SO STIPULATED

DATED: December 6, 2024

KIRKLAND & ELLIS LLP

By: /s/ Robyn E. Bladow

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Dated: December 6, 2024

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Attorneys for Plaintiff Joshua Cross

SIGNATURE CERTIFICATION

Pursuant to Local Rule 5-4.3.4, I hereby attest that all the other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized this filing.

Dated: December 6, 2024

/s/ Robyn E. Bladow
Robyn E. Bladow